

1 COOLEY LLP
BENEDICT Y. HUR (224018)
2 (bhur@cooley.com)
SIMONA AGNOLUCCI (246943)
3 (sagnolucci@cooley.com)
EDUARDO E. SANTACANA (281668)
4 (esantacana@cooley.com)
ARGEMIRA FLÓREZ (331153)
5 (aflorez@cooley.com)
NAIARA TOKER (346145)
6 (ntoker@cooley.com)
HARRIS MATEEN (335593)
7 (hmateen@cooley.com)
THILINI CHANDRASEKERA (333672)
8 (tchandrasedkera@cooley.com)
ISABELLA MCKINLEY CORBO (346226)
9 (icorbo@cooley.com)
CHELSEA HU (357212)
10 (chu@cooley.com)
3 Embarcadero Center, 20th Floor
11 San Francisco, CA 94111-4004
Telephone: (415) 693-2000
12 Facsimile: (415) 693-2222

13 Attorneys for Defendant
GOOGLE LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

20 Plaintiffs,

21 v.

22 GOOGLE LLC,

23 Defendant.
24
25
26
27
28

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF DEFENDANT
GOOGLE LLC'S NOTICE OF FILING
SUPPLEMENTAL EXHIBIT TO MOTION IN
LIMINE No. 1**

1 I, EDUARDO E. SANTACANA, DECLARE AS FOLLOWS:

2 1. I am a partner at Cooley LLP, counsel for Defendant Google LLC (“Google”) in this
3 action. I submit this declaration in support of Defendant Google LLC’s Notice of Filing
4 Supplemental Exhibit to Google’s Motion in Limine No. 1.

5 2. On June 24, 2025, Google filed its Motion in Limine No. 1 (ECF 519). That motion
6 seeks to exclude Plaintiffs from introducing testimony or references related to Blake Lemoine, a
7 former Google employee whose deposition Plaintiffs took in an unrelated matter, *Brown v. Google*
8 *LLC*. Google filed the complete transcript of that deposition along with its motion (ECF 531-19).
9 Plaintiffs filed their Opposition to Google’s Motion in Limine No. 1 on July 10, 2025 (ECF 550).

10 3. On July 24, 2025, Plaintiffs served Google with their proposed deposition
11 designations from the Lemoine transcript in *Brown v. Google*.

12 4. Attached hereto as Supplemental Exhibit to Google’s Motion in Limine No. 1 are
13 excerpts from the Lemoine deposition. Plaintiffs proposed designations are highlighted within these
14 excerpts.

15 I declare under penalty of perjury that the foregoing is true and correct to the best of my
16 knowledge.

17 Executed in San Francisco, California on July 29, 2025

18
19 /s/ Eduardo E. Santacana
20 Eduardo E. Santacana